

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:14-cr-00175-AGF
)	
MARK PALMER,)	
SAMUEL LEINICKE, and)	
CHARLES WOLFE,)	
)	
Defendants.)	

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:14-cr-00152-RWS
)	
CHARLES WOLFE,)	
)	
Defendant.)	

MOTION TO CONTINUE FORFEITURE HEARING

NOW COMES the Defendant, Charles Wolfe, by and through his undersigned counsel and for his Motion to Continue the forfeiture hearing states the following:

1. A forfeiture hearing in this matter is set for December 27, 2017.
2. On December 14, 2017 Defense counsel and the Government met to go over the items of forfeiture and work on limiting the scope of the forfeiture hearing.
3. The Government yesterday filed a new Bill of Particulars adding a new cash forfeiture from another district and matter and a specified money judgment.
4. Defense counsel would request at least a fourteen (14) day continuance of the hearing to attempt to limit the number of witnesses and the scope of the hearing.

5. Counsel also needs to consult with Mr. Wolfe regarding these matters.
6. The Government has been consulted and they consent to the continuance.

WHEREFORE, for the foregoing reasons I respectfully request at least a fourteen (14) day continuance of the forfeiture hearing in the above referenced matter.

Respectfully submitted,

LUCCO, BROWN, THRELKELD & DAWSON

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically with the United States District Court, Eastern District of Missouri, this 20th day of December, 2017.

/s/ Christopher P. Threlkeld